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EXHIBIT B

PROPOSED ORDER

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Nevada Counsel for Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:

RODEO CREEK GOLD INC.

- ☐ Affects this Debtor
☒ Affects all Debtors
☐ Affects Antler Peak Gold Inc.
☐ Affects Hollister Venture Corporation
☐ Affects Touchstone Resources Company

Chapter 11

Case No. BK-13-50301 (MKN)

Jointly Administered

**ORDER REJECTING ALL
EXECUTORY CONTRACTS AND
UNEXPIRED LEASES**

Hearing Date: June 6, 2013
Hearing Time: 1:30 p.m. (PT)
Place: 300 Las Vegas Blvd.
Las Vegas, NV 89101

Upon the motion (the “Motion”)¹ of the Debtors² in the above-captioned chapter 11 cases for the entry of an order pursuant to sections 365 of the United States Code, 11 U.S.C. §§ 101 et

¹ Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Motion.

1 seq. (the “Bankruptcy Code”) and Rule 6006 of the Federal Rules of Bankruptcy Procedure (the
2 “Bankruptcy Rules”), authorizing the Debtors to reject all executory contracts and unexpired
3 leases to which a Debtor is a party, *nunc pro tunc* to May 20, 2013 (the “Closing Date”); and this
4 Court having jurisdiction to consider the Motion and the relief requested therein in accordance
5 with 28 U.S.C. §§ 157 and 1334; and the consideration of the Motion and the relief requested
6 therein being a core proceeding pursuant to 28 U.S.C. § 157; and venue being proper before this
7 Court pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having determined that the legal
8 and factual bases set forth in the Motion establish just cause for the relief granted herein; and this
9 Court having determined that the relief sought in the Motion is in the best interests of the
10 Debtors, their creditors and all parties in interest; and after due deliberation, it is therefore

11 ORDERED that the Motion is GRANTED; and it is further

12 ORDERED that the executory contracts and unexpired leases to which a Debtor is a party
13 and that have not been previously assumed (the “Rejected Contracts and Leases”), including, but
14 not limited to, the Rejected Contracts and Leases listed on Exhibit A to the Motion, are rejected
15 effective as of the Closing Date; and it is further

16 ORDERED that all counterparties to the Rejected Contracts and Leases rejected pursuant
17 to this Order shall immediately return to the Debtors’ estates any deposits, prepayments or other
18 funds held by such counterparties; and it is further

19 ORDERED that, consistent with the Bar Date Order entered in these Chapter 11 Cases, a
20 proof of claim for any alleged rejection damages in connection with the rejection of a contract or
21 lease pursuant to this Order will be deemed timely submitted only if actually received by the
22 Debtors’ claims agent, The Garden City Group, Inc. (“GCG”), within thirty (30) days of the
23 Closing Date; and it is further

24 ORDERED, that proofs of claim sent to GCG via first-class mail shall be addressed to
25 Rodeo Creek Gold Inc., et al., c/o GCG Inc., P.O. Box 9970, Dublin, OH 43017-5970; proofs of
26

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28 ² The Debtors in these chapter 11 cases are: Rodeo Creek Gold Inc., Hollister Venture Corporation, Touchstone
Resources Company and Antler Peak Gold Inc.

1 claim sent to GCG via hand delivery or overnight courier shall be addressed to Rodeo Creek
2 Gold Inc., et al., c/o GCG Inc., 5151 Blazer Pkwy., Suite A, Dublin, OH 43017; and it is further

3 ORDERED, that the terms and conditions of this Order shall be immediately effective
4 and enforceable upon its entry; and it is further

5 ORDERED that the Debtors are authorized and empowered to take all actions necessary
6 to implement the relief granted in this Order; and it is further

7 ORDERED that this Court shall retain jurisdiction to hear and determine all matters
8 arising from the implementation and/or interpretation of this Order.

9
10 SUBMITTED BY:

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In accordance with Local Rule 9021, counsel submitting this document certifies as follows (check one):

____ The court has waived the requirement set forth in Local Rule 9021(b)(1)

____ No party appeared at the hearing or filed an objection to the Motion.

____ I have delivered a copy of this proposed order to all counsel who appeared at the hearing, and each has approved or disapproved the order, or failed to respond, as indicated below [list each party and whether the party has approved, disapproved, or failed to respond to the document]:

____ I certify that this is a case under chapter 7 or 13, that I have served a copy of this order with the motion pursuant to Local Rule 9014(g), and that no party has objected to the form or content of the order.

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